

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ALEJANDRO HUGGINS, on behalf of :  
himself and others similarly situated :

*Plaintiff, and Lead* :  
*Plaintiff for the Proposed* :  
*Class,* :

v

CHESTNUT HOLDINGS INC.; 1425 U :  
LLC; and JONATHAN WIENER :

*Defendants* :  
----- X

Civil Action No. 18-001037-PAC

**NOTICE OF MOTION TO OVERRULE  
OBJECTIONS TO AND TO COMPEL  
RESPONSES TO REQUESTS FOR  
PRODUCTION AND  
INTERROGATORIES**

**To:** Daniel C. Moreland  
Neresa De Biasi  
Clifton Budd & DeMaria, LLP  
*Attorneys for Defendants*  
350 Fifth Avenue, Suite 6110  
New York, New York 10118

**PLEASE TAKE NOTICE** that upon the attached Declaration of Scott Simpson, dated November 28, 2018, and the exhibits annexed thereto, the accompanying Memorandum of Law in Support of Plaintiff's Motion to Overrule Objections to and to Compel Responses to Requests for Production and Interrogatories, and upon all prior pleadings and proceedings herein, Plaintiff Alejandro Huggins, through his attorneys, Beranbaum Menken LLP, will move this Court before the Honorable Paul A. Crotty, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 14C, for an Order pursuant to Fed. R. Civ. P. 37 overruling Defendants' objections to Plaintiff's Requests to Produce 11, 13, 16-19, 21-26, and 30,

and Defendant's objections to Plaintiff's Interrogatories 1, 6, 8, and 9, and compelling Defendants to provide responsive documents to Plaintiff's Requests to Produce 11, 13, 16-19, 21-26, and 30, and Interrogatories 1, 6, 8, and 9 by a date certain, and for any other such relief as the Court finds just and proper.

Dated: New York, New York  
November 28, 2018

/s/ Brenna Rabinowitz  
Brenna Rabinowitz  
Scott Simpson  
Beranbaum Menken LLP  
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